

Paul S. Padda, Esq., (NV Bar #10417)
PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tel: (702) 366-1888; Fax: (702) 366-1940
Email: psp@paulpaddalaw.com

Antonio M. Romanucci, Esq. (Admitted PHV)
Patrick Driscoll, Esq. (Admitted PHV)
Romanucci and Blandin, LLC
321 N. Clark Street, Suite 900
Chicago, IL 60654
Tel: 312-253-8632; Fax: 312-458-1004
Email: aromanucci@rblaw.net
Email: pdriscoll@rblaw.net

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KRISTINA KERLUS, individually,

Plaintiffs,

v.

DR. JENNIFER CORNEAL, in her
individual capacity; A. SANTOS, in her
individual capacity; CITY OF LAS VEGAS,
a Municipal corporation; and COUNTY OF
CLARK, a Municipal corporation; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT, jointly and severally,

Defendants.

Case No.: 2:24-cv-02352-APG-DJA

**PLAINTIFF'S STIPULATION, REQUEST
AND ORDER EXTENDING TIME TO
RESPOND TO DEFENDANT LVMPD'S
MOTION TO DISMISS
[ECF No. 44]**

(First Request)

Plaintiff Kristina Kerlus ("Plaintiff") and Defendant Las Vegas Metropolitan Police
Department ("LVMPD"), by and through their respective counsel, hereby stipulate and agree
as follows:

1 1. Plaintiff filed her Complaint on December 17, 2024. [ECF No. 1]. On December
2 19, 2024, Plaintiff filed a First Amended Complaint (“FAC”). [ECF No. 7].

3 2. LVMPD filed its Motion to Dismiss the FAC on May 27, 2025. [ECF. No. 44].

4 3. The current deadline for Plaintiff to respond to the Motion to Dismiss is June 10,
5 2025.

6 4. Given the unusual circumstances surrounding the filing of the Complaint and the
7 FAC, the concurrent briefing on Plaintiff’s motion for an extension of time to serve LVMPD
8 (ECF No. 40), and the complexity of the *Monell* claims at issue in LVMPD’s Motion to
9 Dismiss, Plaintiff’s counsel requires additional time to respond.

10 5. Upon agreement of all parties hereto, the undersigned respectfully request that this
11 Court grant a 14-day extension of time, up to and including June 24, 2025, to respond to
12 LVMPD’s Motion to Dismiss.

13 6. This is the first request for an extension of time to respond to LVMPD’s Motion to
14 Dismiss.

15 7. This Stipulation is entered into in good faith and not for the purposes of delay.

16 DATED this 4th day of June, 2025.

17 By: /s/ Paul S. Padma
18 PAUL S. PADDA (10417)
19 4560 South Decatur Blvd., #300
Las Vegas, NV 89103
Attorneys for Plaintiff

20 By: /s/ Lyssa S. Anderson
21 LYSSA S. ANDERSON (5781)
22 KRISTOPHER J. KALKOWSKI (14892)
23 TRAVIS C. STUDDARD (16454)
1980 Festival Plaza Drive, # 650
Las Vegas, Nevada 89135
Attorneys for Defendant LVMPD

24 **ORDER**

25 IT IS SO ORDERED.

26
27 UNITED STATES DISTRICT COURT JUDGE

28 Dated: _____